

EXHIBIT 19

Kenneth A. Gallo (*pro hac vice*)
Joseph J. Simons (*pro hac vice*)
Craig A. Benson (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
2001 K Street, NW
Washington, DC 20006
Telephone: (202) 223-7300
Facsimile: (202) 223-7420
kgallo@paulweiss.com
jsimons@paulweiss.com
cbenson@paulweiss.com

Stephen E. Taylor (SBN 058452)
Jonathan A. Patchen (SBN 237346)
TAYLOR & COMPANY LAW OFFICES, LLP
One Ferry Building, Suite 355
San Francisco, California 94111
Telephone: (415) 788-8200
Facsimile: (415) 788-8208
Email: staylor@tcolaw.com
Email: jpatchen@tcolaw.com

*Attorneys for Plaintiffs Sharp Electronics Corporation and Sharp
Electronics Manufacturing Company of
America, Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 13-cv-01173 SC
Case No. 07-cv-05944 SC

This Document Relates to: Individual Case No.
13-cv-01173 SC

MDL No. 1917

SHARP ELECTRONICS CORPORATION;
SHARP ELECTRONICS MANUFACTURING
COMPANY OF AMERICA, INC.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

**SHARP ELECTRONICS
CORPORATION AND SHARP
ELECTRONICS
MANUFACTURING COMPANY OF
AMERICA, INC.'S FIRST SET OF
REQUESTS FOR PRODUCTION TO
DEFENDANT TECHNICOLOR
USA, INC., F/K/A THOMSON
CONSUMER ELECTRONICS, INC.**

DATE: MAY 14, 2014

PROPOUNDING PARTIES: Plaintiffs Sharp Electronics Corporation and Sharp
Electronics Manufacturing Company of America, Inc.

RESPONDING PARTIES: Technicolor USA, Inc., f/k/a Thomson Consumer
Electronics, Inc.

SET NO.:

ONE

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc. (collectively, “Sharp”), through their undersigned counsel, request that Defendant Technicolor USA, Inc., f/k/a Thomson Consumer Electronics, Inc. (“Thomson Consumer”) responds to the following requests for production and produce for inspection and copying all documents and things herein within thirty (30) days of service, and afterwards supplement such production as may become necessary to comply with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure. Defendant is directed to serve verified answers at PAUL, WEISS, RIFKIND, WHARTON & GARRISON, LLP, Attn: Craig A. Benson, 2001 K St., N.W., Washington, DC 20006, or at another time and place as may be mutually agreed upon by counsel for the parties.

DEFINITIONS AND INSTRUCTIONS

1. “All” shall be construed as all, each, any, and every.
2. The terms “and” and “or” shall be construed either disjunctively or conjunctive as necessary to bring within the scope of the Interrogatories all information that might otherwise be construed to be outside of their scope.
3. The term “Document” includes all documents and electronically stored information as defined in Federal Rule of Civil Procedure 34(a). A draft or non-identical copy is a separate document within the meaning of this term.
4. The term “Evidence” means Documents, witness statements or testimony, and discovery responses.
5. The terms “Identify,” “Describe,” and “State” mean:
 - i. As to a person, to state the full name, where the person worked during the time period to which your answers pertains, the person’s current or last known employer and position, and the person’s current or last known home and business address, and telephone numbers;

- ii. As to a Company, to state the full legal name, business address, and business telephone numbers;
- iii. As to a Document, to describe the type of document (e.g., letter, statement, memorandum, telegram, notes of telephone conversation, etc.), the general subject matter, the date of the document, the identity of the sender(s) and recipient(s), and its present location and custodian, in lieu thereof, a copy of the document may be produced;
- iv. As to a Communication, to state the type of communication (e.g., oral, written, computer, etc.), the date and substance of such communication, the identity of the participants, and any documents evidencing or supporting such communication.

6. When referring to any fact, act, occurrence, transaction, statement, communication, document, or other matter, “Identify,” “Describe,” “Explain,” or “State” means to describe and identify the facts constituting such matter.

7. “Including” or “includes” means without limitation.

8. “Reflect(ing) or refer(ring) to” means a statement or communication about, relating to, concerning, describing, containing, identifying, or in any way pertaining to the subject matter in the request.

9. The term “Interrogatories” refers to the interrogatories enumerated in Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America’s First Set of Interrogatories to Defendant Technicolor USA, Inc., f/k/a Thomson Consumer Electronics, Inc., served concurrently herewith.

10. The term “Thomson Consumer” refers to Technicolor USA, Inc., f/k/a Thomson Consumer Electronics, Inc.

11. The terms “You” and “Your” mean Thomson Consumer, as defined herein, and its subsidiaries, affiliates and their subsidiaries, and any employees, agents, representatives or any persons acting or purporting to act on Your behalf, including each of Your attorneys.

1 12. The term “Sharp” means the plaintiffs Sharp Electronics Corporation and Sharp
2 Electronics Manufacturing Company of America, Inc.

3 13. If You cannot respond to a request for production fully, after a diligent attempt to
4 obtain the requested information, You must answer the request to the extent possible, specify the
5 portion of the request You are unable to answer, and provide whatever information You have
6 regarding the answered portion.

7 14. In the event that any requested Document has been destroyed, lost, discarded or is
8 otherwise no longer in Your possession, custody, or control, You shall Identify the document as
9 completely as possible and specify the document’s disposal date, disposal manner, disposal
10 reason, the Person who authorized the disposal, and the Person who disposed of the document.

11 15. In the event any information is withheld on a claim of attorney-client privilege,
12 work-product doctrine, or any other applicable privilege, You shall provide a privilege log that
13 includes at least the following information: the nature of the information contained in the
14 withheld document, the document date, source, and subject matter, the author(s) and recipient(s),
15 such as would enable the privilege claim to be adjudicated.

16 16. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, these document
17 request are continuing in nature so that if You subsequently discover or obtain possession,
18 custody, or control of any document covered by these requests, You shall promptly make any
19 such document available to Plaintiffs.

20 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

21 **Request No. 1:**

22 Produce All Documents You Identified or were requested to Identify in response
23 to the Interrogatories.

24
25 DATED: May 14, 2014 By: Craig A. Benson

1 Kenneth A. Gallo (*pro hac vice*)
2 Joseph J. Simons (*pro hac vice*)
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4 **PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP**
5 2001 K Street, NW
6 Washington, DC 20006
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12 *Attorneys for Plaintiffs Sharp Electronics Corporation and*
13 *Sharp Electronics Manufacturing Company of America, Inc.*